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June 28, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Cable Special Relief Petitions; MB Docket No. 12-1

Dear Ms. Dortch:

Consistent with the Market Modification docket referenced above, attached are results for a preliminary evaluation of a potential market modification for station KVTJ in Cross County, AR, St. Francis County, AR, Woodruff County, AR, Crittenden County, AR, Poinsett County, AR, Mississippi County, AR, Pemiscot County, MO, and Dunklin County, MO.

If you have any questions, feel free to contact me at (202) 457-3058.

Sincerely,

/s/ Christopher M. Heimann



June 27, 2016

Via E-mail and U.S. Mail

Jim Grant
General Manager/Associate Minister
KVTJ-DT Jonesboro/Memphis
Victory Television Network, Inc.
P.O. Box 26207
Little Rock, AR 72221

Dear Mr. Grant:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for station KVTJ in Cross County, AR, St. Francis County, AR, Woodruff County, AR, Crittenden County, AR, Poinsett County, AR, Mississippi County AR, Pemiscot County, MO, and Dunklin County, MO.

DIRECTV's engineering staff was given the areas to evaluate for our Jonesboro, AR spot beam, and have found that:

- DIRECTV's spot beam does not cover **13** zip codes in Crittenden County
- DIRECTV's spot beam does not cover **2** zip codes in Cross County
- DIRECTV's spot beam does not cover **4** zip codes in St. Francis County
- DIRECTV's spot beam does not cover **1** zip code in Woodruff County
- DIRECTV's spot beam does not cover **2** zip codes in Poinsett County
- DIRECTV's spot beam does not cover **21** zip codes in Mississippi County
- DIRECTV's spot beam does not cover **12** zip codes in Pemiscot County
- DIRECTV's spot beam does not cover **5** zip codes in Dunklin County

DIRECTV will forward the results of this preliminary evaluation to the FCC for their records.

Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

Form of Certification Regarding Spot Beam Coverage

1. My name is Phil Goswitz. I am SVP of Engineering at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

| Station | State | County |
|---------|-------|---|
| KVTJ | AR | Crittenden, Cross, Mississippi, Poinsett, St Francis, Woodruff, Dunklin, Pemiscot |

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
- The measured performance of the spot beam covering this Television Station's local market.
 - Estimated atmospheric effects for reception of the signal.
 - Estimated levels of interference.
 - The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
- Signal availability.
 - Clear sky signal margin.
 - Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
- ☐ Can provide service to all the zip codes associated with this request.
 - ☐ Cannot provide service to any of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
 - ☒ Cannot provide service to some of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service. The list of unserved zip codes is attached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

6/20/16
Date

Signature

Wednesday, March 02, 2016

| Station | Zip | USPSFIPS | State | County | Covered? | Evaluation Completed |
|---------|-------|----------|-------|-------------|----------|----------------------|
| KVTJ | 72301 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72303 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72325 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72327 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72331 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72332 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72339 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72346 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72348 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72364 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72376 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72384 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72386 | 05035 | AR | Crittenden | No | 6/15/2016 |
| KVTJ | 72331 | 05037 | AR | Cross | No | 6/15/2016 |
| KVTJ | 72346 | 05037 | AR | Cross | No | 6/15/2016 |
| KVTJ | 63849 | 29069 | MO | Dunklin | No | 6/15/2016 |
| KVTJ | 63855 | 29069 | MO | Dunklin | No | 6/15/2016 |
| KVTJ | 63857 | 29069 | MO | Dunklin | No | 6/15/2016 |
| KVTJ | 63875 | 29069 | MO | Dunklin | No | 6/15/2016 |
| KVTJ | 63877 | 29069 | MO | Dunklin | No | 6/15/2016 |
| KVTJ | 72310 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72313 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72315 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72316 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72319 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72321 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72329 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72330 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72338 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72350 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72351 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72354 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72358 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72370 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72386 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72391 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72395 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72426 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72428 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72438 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 72442 | 05093 | AR | Mississippi | No | 6/15/2016 |
| KVTJ | 63826 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63827 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63830 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63839 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63840 | 29155 | MO | Pemiscot | No | 6/15/2016 |

| | | | | | | |
|------|-------|-------|----|------------|----|-----------|
| KVTJ | 63848 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63849 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63851 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63853 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63873 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63877 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 63879 | 29155 | MO | Pemiscot | No | 6/15/2016 |
| KVTJ | 72354 | 05111 | AR | Poinsett | No | 6/15/2016 |
| KVTJ | 72386 | 05111 | AR | Poinsett | No | 6/15/2016 |
| KVTJ | 72021 | 05123 | AR | St Francis | No | 6/15/2016 |
| KVTJ | 72346 | 05123 | AR | St Francis | No | 6/15/2016 |
| KVTJ | 72348 | 05123 | AR | St Francis | No | 6/15/2016 |
| KVTJ | 72376 | 05123 | AR | St Francis | No | 6/15/2016 |
| KVTJ | 72021 | 05147 | AR | Woodruff | No | 6/15/2016 |